

REMARKS

Upon entry of this amendment, claims 1-11 and 13-25 are all the claims pending in the application. Claim 12 has been canceled by this amendment, and claims 24 and 25 have been added as new claims. No new matter has been added.

I. Objections to the Specification

The Examiner has objected to the specification for the reasons set forth on page 2 of the Office Action. Applicants are submitting herewith a substitute specification and abstract which address the Examiner's objections and include various editorial amendments that have been made for grammatical and general readability purposes. No new matter has been added. Also enclosed is marked-up copy of the original specification and abstract showing the changes incorporated into the substitute specification and abstract.

II. Claim Rejections under 35 U.S.C. § 103(a)

The Examiner has rejected claims 1-12 and 20-23 under 35 U.S.C. §103(a) as being unpatentable over Satoshi et al. (JP 2000-078484) (hereafter "Satoshi") in view of Applicants' Admitted Prior Art (hereafter "AAPA").

By this amendment, claim 1 has been amended so as to incorporate the features of claim 12. Thus, claim 1 now recites the feature of an electric charge simultaneous removal unit that simultaneously outputs the readout signal and the reset signal to all of the photoelectric conversion circuits disposed in the region to be read out.

In the Office Action, the Examiner has taken the position that Satoshi discloses the above-

noted feature (see Office Action at page 8). Applicants respectfully disagree.

In particular, regarding Satoshi, Applicants note that this reference discloses a solid-state imaging device in which the opening of a mechanical shutter 2 and the output of a reset signal occur at the same time (see Abstract; and paragraphs [0011] through [0013]). As explained in Satoshi, an exposure period begins when the opening of the shutter and the output of the reset signal takes place, and when the mechanical shutter closes, the exposure period ends (see paragraphs [0011] through [0013]).

Based on the foregoing description, Applicants note that while Satoshi discloses the ability to open a mechanic shutter at the same time that a reset signal is output, that Satoshi does not disclose or in any way suggest the ability to simultaneously output a readout signal and a reset signal to all of the photoelectric conversion circuits disposed in a region to be read out, as recited in amended claim 1. Moreover, Applicants respectfully submit that AAPA fails to cure this deficiency of Satoshi.

In view of the foregoing, Applicants respectfully submit that the combination of Satoshi and AAPA does not teach, suggest or otherwise render obvious at least the above-noted feature recited in amended claim 1. Accordingly, Applicants submit that claim 1 is patentable over the cited prior art, an indication of which is kindly requested. Claims 2-11, 20 and 21 depend from claim 1 and are therefore considered patentable at least by virtue of their dependency.

Regarding claims 22 and 23, Applicants note that both of these claims have been amended so as to recite that the electric charge simultaneous removal unit simultaneously outputs the readout signal and the reset signal to all of the photoelectric conversion circuits disposed in

the region to be read out.

For at least similar reasons as discussed above with respect to claim 1, Applicants respectfully submit that the combination of Satoshi and AAPA does not teach, suggest or otherwise render obvious the above-noted feature recited in claims 22 and 23. Accordingly, Applicants submit that claims 22 and 23 are patentable over the cited prior art, an indication of which is kindly requested.

III. Allowable Subject Matter

Applicants thank the Examiner for indicating that claims 13-19 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form.

By this amendment, Applicants note that claims 13, 17 and 19 have been rewritten in independent form, thereby placing these claims in condition for allowance. Claims 14-16 depend from claim 13, and claim 18 depends from claim 17. Accordingly, Applicants submit that claims 14-16 and 18 are patentable at least by virtue of their dependency.

IV. New Claims

Claims 24-25 have been added as new claims. Applicants note that claims 24 and 25 depend from claim 1 and are therefore considered patentable at least by virtue of their dependency.

V. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may best be resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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